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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

29 Jewell Bates Brown, an individual,

30 Plaintiff,

31 v.

32 Credit One Bank, N.A.,

33 Defendant.

Case No. 2:17-cv-00786-JAD-VCF

**STIPULATION AND ORDER  
TO EXTEND DISCOVERY  
DEADLINES (FIRST  
REQUEST)**

34 Credit One Bank, N.A. ("Credit One") and Jewell Bates Brown ("Plaintiff") request  
35 that the Court extend the current discovery deadlines in this case by 180 days.

**Discovery Completed To Date:**

Plaintiff served written discovery requests on Credit One on August 8, 2017. Credit One responded on September 13, 2017. Plaintiff seeks further responses, but Credit One has objected to further responses pending the Court's ruling on the Motion to Compel Arbitration [Dkt. 23] and Motion to Dismiss or Stay [Dkt 24 and 25] that Credit One filed on September 11, 2017. Said motions are fully briefed.

**Discovery that Remains To Be Completed:**

Plaintiff intends to file a motion to compel substantive responses to the written discovery requests. Plaintiff also plans to conduct the 30(b)(6) deposition of Credit One after obtaining substantive responses to the written discovery. And, Plaintiff intends to disclose an expert.

Subject to the Court's ruling on the pending motions, Credit One may serve written discovery, take relevant depositions, and disclose a rebuttal expert.

**Reason Why Discovery Not Completed:**

Credit One has objected to proceeding further in discovery until there is a ruling on the pending Motion to Compel Arbitration and Motion to Dismiss or Stay. In the meantime, Credit One has responded to relevant written discovery requests as a measure of good faith and produced relevant documents pertaining to the pending motions. As mentioned previously, Plaintiff intends to file a motion to compel further discovery responses. In addition, Plaintiff's counsel, Mr. Ankorn, is experiencing severe medical issues with his immediate family right now that are very time consuming. Accordingly, good cause exists to extend the current discovery deadlines for 180 days.

**Proposed Schedule for Completing Discovery:**

- a. **Discovery Cut-Off Date: October 4, 2018**
- b. **Expert Report Deadline: August 6, 2018**
- c. **Rebuttal Expert Report Deadline: September 7, 2018**
- d. **Deadline for Amending Pleadings/Adding Additional Parties:**  
**July 5, 2018**
- e. **Dispositive Motion Deadline: November 5, 2018**
- f. **Interim Status Report: August 2, 2018**
- g. **Joint Pre-trial Order: December 4, 2018**, or in the event that a  
summary judgment or adjudication motion is filed, the date for  
filing the joint pretrial order shall be suspended until 30 days after  
decision on the summary judgment or adjudication motion or until  
further order of the court.
- h. **Pretrial Disclosures:** The disclosures required by Fed. R. Civ. P.  
26(a)(3), and any objections thereto, shall be included in the joint  
pretrial order.

IT IS SO STIPULATED.

Dated: January 17, 2018

*/s/ Ann Marie Hansen*

Attorney for Plaintiff

Dated: January 17, 2018

*/s/ Tuan Uong*

Attorney for Defendant

IT IS SO ORDERED.



United States Magistrate Judge

Dated: 1-23-2018